



IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF MISSISSIPPI  
~~GULFPORT~~ DIVISION

*Southern*

IN RE: *EX PARTE* APPLICATION OF  
LAURA ZÚNIGA CÁCERES, BERTHA  
ZÚNIGA CÁCERES, AND SALVADOR  
ZÚNIGA CÁCERES FOR ASSISTANCE  
BEFORE A FOREIGN TRIBUNAL

CASE NO.:

*1:19mc405 LG-RHW*

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DECLARATION OF RALITZA S. DINEVA IN SUPPORT OF *EX PARTE*  
APPLICATION OF LAURA ZÚNIGA CÁCERES, BERTHA ZÚNIGA CÁCERES,  
AND SALVADOR ZÚNIGA CÁCERES FOR DISCOVERY FOR USE IN A FOREIGN  
TRIBUNAL PURSUANT TO 28 U.S.C. § 1782

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I, Ralitza S. Dineva, declare as follows:

1. I am an attorney in good standing and admitted to practice law in the State of California (Bar No. 305974). I intend to apply to be admitted *pro hac vice* to practice law before this Court. I make this declaration in support of the *Ex Parte* Application of Laura Zúniga Cáceres, Bertha Zúniga Cáceres, and Salvador Zúniga Cáceres for Discovery for Use in a Foreign Tribunal Pursuant to 28 U.S.C. § 1782. I have personal knowledge of the following facts, and if called upon would and could testify competently thereto.

2. I retained Transperfect Translations and provided its representative with copies of Spanish language documents attached to this declaration as Exhibits 1, 8, 11, and 12 ("Spanish Language Exhibits"). Transperfect Translations translated the text of the Spanish Language Exhibits from Spanish to English and provided certifications of the translations. The (1) translation and (2) certification of each Spanish Language Exhibit is included in each of Exhibits 1, 8, 11, and 12.

3. Attached as Exhibit 1<sup>1</sup> are true and correct copies of a Spanish language Organization of American States (Organización de los Estados Americano, OEA) Press Release, dated March 4, 2019, an English translation of that document, and a certification of translation.

4. Attached as Exhibit 2 is a true and correct copy of a *New York Times* article titled “Who Ordered Killing of Honduran Activist? Evidence of Broad Plot Is Found,” dated October 28, 2017.

5. Attached as Exhibit 3 is a true and correct copy of a CNN article titled “Berta Cáceres’ family seeks justice on anniversary of fearless activist’s death,” dated March 3, 2017.

6. Attached as Exhibit 4 is a true and correct copy of a Goldman Environmental Prize recipient profile of Berta Cáceres.

7. Attached as Exhibit 5 is a true and correct copy of a *New York Times* article titled “Berta Cáceres, Indigenous Activist, Is Killed in Honduras,” dated March 4, 2016.

8. Attached as Exhibit 6 is a true and correct copy of an *America* article titled “In Honduras, Berta Cáceres’s killers have been convicted,” dated November 30, 2018.

9. Attached as Exhibit 7 is a true and correct copy of a *New York Times* article titled “Honduras Police Arrest Executive in Killing of Berta Cáceres, Indigenous Activist,” dated March 3, 2018.

10. Attached as Exhibit 8 are true and correct copies of a Spanish language Criminal Indictment against Roberto David Castillo Mejía issued by the Honduran Public Ministry and dated March 1, 2018, an English translation of that document, and a certification of translation.

11. Attached as Exhibit 9 are true and correct copies of a Deed of Trust (dated November 4, 2016), a Warranty Deed with Vendor’s Lien (dated November 4, 2016), and a Harris County real property appraisal for tax year 2018 related to a property located at 3735 Jardin St., Houston, Texas.

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<sup>1</sup> For the Court’s convenience, Exhibits 1 through 13 bear consecutive page numbers.

12. Attached as Exhibit 10 is a true and correct copy of a Realtor.com profile, including photos, of the property located at 3735 Jardin St., Houston, Texas.

13. Attached as Exhibit 11 are true and correct copies of Spanish language excerpts from the Code of Criminal Procedure of Honduras, an English translation of that document, and a certification of translation.

14. Attached as Exhibit 12 are true and correct copies of a Spanish language Request for International Legal Assistance issued by the Honduran Public Ministry and dated December 4, 2018, an English translation of that document, and a certification of translation.

15. Attached as Exhibit 13 is a true and correct copy of the Declaration of Víctor Fernández in Support of *Ex Parte* Application of Laura Cáceres, Bertha Cáceres, and Salvador Cáceres for Discovery for Use in a Foreign Tribunal Pursuant to 28 U.S.C. § 1782.

16. On July 13, 2019, I visited Hancock Whitney Bank's website at [www.hancockwhitney.com](http://www.hancockwhitney.com) and retrieved filings with the U.S. Securities and Exchange Commission ("SEC") listed on that website. The most recent SEC filing, Form 10-Q for the quarter ended March 31, 2019, indicates that Hancock Whitney Bank's parent holding company, Hancock Whitney Corporation, is headquartered at Hancock Whitney Plaza, 2510 14th Street, Gulfport, Mississippi.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration was executed on July 16, 2019 in Palo Alto, California.

  
Ralitza Dineva